

I hold Amateur Extra Class license K8IR, and have used the Amateur Bands in the HF Spectrum (80-10 meters) over the past 40 years.

I am pleased to see the Commission has reaffirmed in the Notice of Proposed Rule Making that licensed users have the right to expect interference-free operation on their allotted frequencies. I hope the Commission considers that Amateur licensees, as well as other users of the HF spectrum, frequently expect communications where the received signal may be only a few microvolts per meter. A nearby BPL-injected power line radiating at the current limit under Part 15, could very well completely drown out very usable signals in the Amateur service. It is troubling that the Commission would consider allowing radiated emission limits which even you agree will probably cause harmful interference from BPL systems to at least some licensed users. However, the proposals to require adaptive interference mitigation techniques and to require a database to help identify sources of interference are a step in the right direction.

I believe the rules to be adopted need to be specific as to expected response time by BPL operators when they receive complaints of interference. It is imperative the power industry does a better job responding to BPL interference complaints than they have done resolving power-line interference complaints in the past. A toll-free telephone number available 24 hours per day should be required, along with a response time of 30 minutes to eliminate an interfering BPL source. The determination on whether a BPL signal is causing harmful interference should be left to the licensed station, not the unlicensed system operator, and the system should be required to be shut down if the interference cannot be eliminated to the satisfaction of the licensed station. The Commission should be prepared to arbitrate disputes between licensed stations and unlicensed systems a timely manner. The BPL operators should also be required to regularly report to the Commission the number of complaints they receive and how those complaints were resolved.

I believe the proposed database of BPL systems should be maintained by the Commission to ensure the information is available to the public and kept up to date.

I am not concerned about the methods proposed to measure compliance with Part 15 radiated limits, since even the Commission is acknowledging that in-compliance systems will likely cause harmful interference to some users. Ultimately, the non-interference requirements will be what protects licensed users, more so than the radiated emission limits as proposed. If a licensed station reports interference, the BPL system operator is required under Commission rules to eliminate that interference in a timely matter, or shut down the system, regardless of whether the radiated limits are within limits.

I am surprised there is no mention in the NPRM of interference from licensed stations to BPL systems. There are reports of tests showing Amateur transmitters causing a disruption to BPL data streams at even modest power levels. This should especially be a concern to power companies proposing to use BPL to manage their

distribution systems.

I fear that Amateurs, or other licensed users, may be portrayed as "the bad guys" by BPL system operators when customer service is interrupted, either by interference from licensed transmitters or by shutdowns due to interference mitigation. BPL system operators should be required to make it clear to customers up-front that there is no guaranteed level of service due to the unlicensed status of their infrastructure.